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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO;  
AMERICAN FEDERATION OF STATE  
COUNTY AND MUNICIPAL EMPLOYEES,  
AFL-CIO, et al.,

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL  
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**PLAINTIFFS' NOTICE OF  
DEPOSITION OF KAILEE  
BULLER**

**NOTICE OF DEPOSITION**

**PLEASE TAKE NOTICE** that, pursuant to Federal Rules of Civil Procedure 26 and 30, Plaintiffs, by and through undersigned counsel, will take the deposition of Kailee Buller on **March 11, 2025 at 4:00 p.m. PST** at 80 F Street, NW, Washington, DC 20001, as agreed upon by the parties. The deposition will be taken before a person authorized by law to administer oaths under Federal Rules of Civil Procedure 28(a) and shall continue from one day to the next, excluding Sundays and holidays, until the examination is completed.

Plaintiffs intend and reserve the right to record the deposition testimony of Kailee Buller by videotape and instant visual display, in addition to recording the testimony stenographically and via LiveNote/Realtime, and further intend and reserve the right to provide a secure live internet, video, audio and/or telephonic stream for parties and counsel of record. Plaintiffs reserve the right to use the videotape deposition at the time of trial

1 DATED: March 6, 2025

2 Scott A. Kronland  
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12 By: /s/ Danielle E. Leonard  
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By: /s/Teague Paterson

*Attorneys for Plaintiff American Federation of State  
County and Municipal Employees (AFSCME)*

1 **PROOF OF SERVICE**

2 I am employed in the City and County of San Francisco, California. I am over the age of  
3 eighteen years and not a party to the within action; my business address is 177 Post Street, Suite 300,  
4 San Francisco, California 94108. On March 6, 2025, I served the following document(s):

5 **PLAINTIFFS' NOTICE OF DEPOSITION OF KAILEE BULLER**

6 on the parties, through their attorneys of record, as designated below:

7 **By Electronic Service:** By Email, I caused such document(s) to be served via electronic mail on the  
8 parties in this action by transmitting true and correct copies to the following email address(es):

9 KELSEY J. HELLAND  
10 Assistant United States Attorney  
11 450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
kelsey.helland@usdoj.gov

12 I declare under penalty of perjury under the laws of the State of California that the foregoing  
13 is true and correct. Executed March 6, 2025, at San Francisco, California.

14  
15 /s/ Giorgia Lingiardi  
16 Giorgia Lingiardi  
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